Postal Regulatory Commission Submitted 5/22/2012 4:23:14 PM Filing ID: 82625 Accepted 5/22/2012

# BEFORE THE POSTAL REGULATORY COMMISSION WASHINGTON, D.C. 20268-0001

# MAIL PROCESSING NETWORK RATIONALIZATION SERVICE CHANGES, 2012

Docket No. N2012-1

RESPONSE OF AMERICAN POSTAL WORKERS UNION, AFL-CIO, WITNESS MARC SCHILLER TO UNITED STATES POSTAL SERVICE INTERROGATORIES USPS/APWU-RT2-1-5

(May 22, 2012)

The American Postal Workers Union, AFL-CIO, hereby files the responses of APWU witness Marc Schiller (APWU-RT-2) to the above-listed interrogatories of the United States Postal Service dated May 8, 2012. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

Darryl J. Anderson Jennifer L. Wood Counsel for American Postal Workers Union, AFL-CIO

**USPS/APWU-RT2-1**. Please refer to page 10[sic], lines 2-3 of your testimony. Please identify each document you reviewed in preparation for your testimony by title (supply a descriptive name if necessary), author, date, how you accessed each, and how it can now be accessed. Please provide separate lists of those filed in this case and other documents. For case documents, include in the listing for each the date on which it was filed, the filing party, and the type of document.

#### **RESPONSE:**

Please see document labeled "Attach Resp USPS RT2-1" attached to this response.

**USPS/APWU-RT2-2**. Please refer to page 10[sic], lines 4-5 and 8-11 of your testimony. Please identify each secondary source that you reviewed using the descriptors delineated in USPS/APWU-RT2-1.

- a. Please provide a copy of the data you obtained from "a respected industry source" and file it as a library reference.
  - b. In what form have you "combined" the data you collected and reviewed?
- c. If you developed a qualitative and/or quantitative report, please supply a copy of it in response to this interrogatory. If you developed quantitative results, please provide them and document them in terms envisioned by Rule 31(k) (which allows a third party to replicate the results from raw data, through all processing steps, to your final quantitative outputs).

#### **RESPONSE:**

Please see document labeled "Attach Resp USPS RT2-2" attached to this response.

- (a) Response forthcoming.
- (b) The data referenced in response to part (a) above was examined to conclude that the information provided aligned in general terms with the collective knowledge of the Shorter Cycles team based on many years of experience in the U.S. parcel market. Based on this examination and extensive industry knowledge estimates of data elements used in my testimony were made which were then confirmed as reasonable through discussions with current industry contacts. Rather than a complete and precise business case, my testimony is meant to provide a sense of the magnitude of the parcel opportunity and the risk of implementing network rationalization prior to fully examining the parcel opportunity and determining future parcel strategy. Given this purpose the approach I used is entirely appropriate.
- (c) No such reports or results were produced other than my testimony as filed.

**USPS/APWU-RT2-3.** Please refer to page 10[sic] lines 6-7 of your testimony. Please provide complete documentation of your "modeling effort," including those by which that effort was "commissioned," together with your results, the resultant model, the output of such modeling, any interim or final results, and any reports generated during examination or development of the model. Please also provide any contractual documents underlying that modeling effort.

#### **RESPONSE:**

Please refer to page 20, beginning line 8, all of page 21, including Table 2, both revised May 22, 2012, and through to page 22 line 3 in my testimony, revised May 1, 2012 and Appendix 3, revised May 22, 2012, for a description of the modeling effort and the model output results.

Please also to refer to the testimony of APWU witness Pierre Kacha (APWU-RT-3), from decision/analysis partners, for the complete description of the simulation model. The Priority Mail modeling effort is further documented in the forthcoming Library References APWU-LR-N2012-1/10, APWU-LR-N2012-1/11 and APWU-LR-N2012-1/12, and non-public library references APWU-LR-N2012-1/NP10 and NP11, which includes the model and all inputs and outputs.

There is no contract between Shorter Cycles and decision/analysis partners regarding the model.

**USPS/APWU-RT2-4**. On page 10[sic] of your testimony you first introduce the concept[sic] of "In Depth Interviews ('IDIs')." Please document these IDIs completely—to the extent not already appearing in your testimony—including, but not limited to:

- a. transcripts of each interview (edited, as appropriate, to protect participant identity);
- b. all guidance provided to moderators, including any discussion guide, (beyond what is supplied in your testimony);
- c. explanation for how participants were recruited, using what screening tool(s) with the intention of gathering participants meeting what specific and ranges of characteristics;
- d. participant profiles;
- e. description of the purpose of the IDIs together with a copy of the "Summary of Topics" (TR-2 at 47) provided to participants or potential recruits;
- f. copies of any documents used during the IDIs;
- g. any documents sharing partial or complete results;
- h. all contracts involved; and
- i. each participant's responses to all questions in the Appendix 2 of your testimony (excepting those necessary to preserve any confidentiality promised, in which case a unique identity should nonetheless be associated with each interview).

#### **RESPONSE:**

- (a) Notes from In-Depth-Interviews (IDI's) submitted as Library Reference APWU-LR-N2012-1/13.
- (b) The only guidance provided to interviewers was the Discussion Guide contained in Appendix 2 (revised May 22, 2012).
- (c) The screening process was straightforward. We collected a large number of company names from various sources, including our project team members. A simple Interview Candidate Profile (submitted in Library Reference APWU-LR-N2012-1/13) helped us identify specific prospects. The prospects were then screened, using the Screener document (also submitted Library Reference APWU-LR-N2012-1/13) by calling each prospect to secure a commitment to participate.
- (d) Participant profiles are included in each IDI document; see APWU-LR-N2012-1/13
- (e) The purpose of the IDI's was to engage respondents to elicit input regarding the service and operational changes proposed by the USPS and how those changes might impact each business interviewed. From that information, together with our institutional knowledge of the industry, this would provide insights to develop our

testimony. A copy of the "Shipping Profile" (also submitted in APWU-LR-N2012-1/13) includes a "summary of topics" and a shipping profile grid which prospects were asked to complete prior to the interview. Most respondents declined to complete the profile based on company policy, available time, and /or available data. We attempted to collect as much shipping information as possible at the actual interview which was included in the individual IDI notes.

- (f) The only document shared with the participant during the interview was the "Shipping Profile" containing the "Summary of Topics" (see APWU-LR-N2012-1/13)
- (g) N/A
- (h) N/A
- (i) see Library Reference APWU-LR-N2012-1/13

**USPS/APWU-RT2-5**. Please refer to pages [11-12] of your testimony, Key Findings.

- a. Please explain what effort, if any, was undertaken to focus participants upon "customer runoff" caused only by the proposed changes in First-Class Mail service standards, or upon the specific changes proposed in this docket.
- b. Please explain in detail the foundation for, and analytical steps involved in, the comparison between your qualitative results and those of the quantitative research you refer to as "abandoned." Include in your explanation how you were able to distinguish between results that would be "more consistent" from those that might be "much more consistent."
- c. Please cite to any examples in academic literature that support the empirical path you explain in response to part (b) that supports the making of such comparisons and how it applies to the comparison that you made.
- d. Discussion of which specific questions elicited information useful to inform the conclusions stated in the last two sentences of Key Findings number 2?
- e. What statements made by respective participants offer support, within Key Findings number 3, for:
  - 1) The first sentence;
  - 2) The second sentence up to the semicolon;
  - 3) The rest of the second sentence;
- 4) What characteristics of the response to subpart (e)(2) compared to the response to subpart (e)(3) led you to conclude that the latter was "more important"?
- 5) Does the last clause of that second sentence ("requiring the USPS to perform better") reflect your own conclusion, or does it also derive from specific participant statements? If the latter, please identify those statements supporting the statement.

#### **RESPONSE:**

Please refer to Appendix 1 which is a more detailed report of the Market Research Perspective gained through our qualitative interviews with customers, and to the Discussion Guide for the customer interviews, contained in Appendix 2 (revised May 22, 2012) of my testimony.

(a) Please refer to pages 54-55 of my testimony (APWU-RT-2) revised May 1, 2012, Appendix 2, Discussion Guide, Part II, section G. Network Rationalization, revised May 22, 2012. In this section, we describe the initiative of Network Rationalization and the related service standard changes specific to FCM and then ask the respondents several questions about their awareness of the change and the potential impact of the change (Q 4-5). The structure of the guide was designed to move the discussion from specific service standard changes to progressive additional changes and then add more complex issues.

(b) Please refer to page 11, lines 2-3 of my testimony (APWU-RT-2), revised May 1, 2012.

Our research was strictly qualitative in nature. The foundation of the research is described on the same page 11, lines 6-8, as in-depth interviews with 17 parcel shippers. Please also refer to pages 41-43, Appendix 1, under the heading Methodology for further "foundation".

No specific analytical steps were required to assess the results of customer responses in our research relative to the quantitative research of the USPS. In our research we are simply reflecting customer sentiment. Please also refer to page 49 of my revised testimony, Appendix 1, the first and second full paragraphs, that explain how we would interpret the qualitative results to be "much more consistent" with the research results described in USPS-LR-N2012-1/70.

Respondents tended to broaden the discussion beyond specific individual USPS initiatives and often began to discuss broader, more complex issues before the interview progressed through each designed step. Respondents seemed naturally inclined to discuss the bigger picture that reflects the actual state of the USPS, the challenges it currently faces, and the various past and proposed initiatives designed to improve the financial viability of the Postal Service. Relative to the research discussed in the testimony of Witness Elmore-Yalch (USPS-T-11), the quantitative research conducted by OCR on behalf of the USPS in August/September of 2011, as described in USPS-LR-N2012-1/70, more accurately reflects the broader context in which customers are forming opinions and making shipping decisions. This was borne out in our interviews.

There was no intended distinction between "more consistent" and might be "much more consistent" as referenced in your question.

(c) I am unaware of any such examples in academic literature. Rather, Shorter Cycles believes from many years' experience that it is simply common sense to listen to customers, and it is valid to directly reflect and interpret those qualitative results.

As noted in my response to USPS/APWU-RT2-5(b), the August/September 2011 quantitative research conducted by OCR on behalf of the Postal Service more accurately reflects the broader context in which customers are forming opinions and making shipping decisions than the research reported by USPS Witness Elmore-Yalch (USPS-T-11). This was borne out in our interviews.

- (d) Please refer to page 65, Appendix 2, of my testimony (APWU-RT-2), revised May 1, 2012, under the heading "General Questions", #5 and #8.
- (e) Please refer to my testimony (APWU-RT-2), revised May 1, 2012, Appendix 1, pages 48-49, section labeled "The Big Picture."
  - (1) "we want them to survive" IDI 001 question J5

"we need for them to survive" IDI 005 question F1

"But I want them to succeed" IDI 007 question J3

"well, I would really like to see them do what all private carriers do for a lower price" IDI 015 question J9

"they will probably be out of business. I hope not..."

IDI 013 question J8

(2) "focus on the stuff going well—don't let mail drag down the parcel service" IDI 002 question 9

"our business is dependent on them" IDI 005 question F2

"decreased network capability; lost capacity to grow will reinforce the downward spiral" IDI 004 question J5

"Make mail even more affordable" IDI 009 question J4

"availability of records and documents quickly and reliably...we rely on the Postal Service in this regard" IDI 013 question J3

(3) "more in parcels" IDI 001 question J5

"focus more on parcels" IDI 002 question J9

"National ground service and regional 1-day ground service" IDI 004 question J6

"more competitive in parcel shipping...good to have another competitor"
IDI 007 question J4

"reliable competitive package shipping" IDI 008 question J6

"viable package delivery business" IDI 010 question J4

"better tracking, definite day of delivery" IDI 011 question J4

"we need a great parcel shipper like UPS...gives us excellent information" IDI 013 question J6

"we'd like to see them do all that private carriers do" IDI 15 question J9

- (4) My testimony does not state that effective competition in the parcel market is "more important" than maintaining current service as this question suggests. Rather, the finding that customers want to seek an improvement in parcel service was "more important" to our discussion about the parcel opportunity, which is the focus of my testimony.
- (5) Both. Please refer to my testimony, revised May 1, 2012, page 49, Appendix 1, middle of the third full paragraph. In addition, customers made the following comments in several interviews:

"reliability, more customer focus and attitude" IDI 003 question J7

"whether or not they can actually make it happen" IDI 005 question J8

"more timely in pick-up and delivery" IDI 006 J4

"service is so poor they could hardly get worse" IDI 007 question J3

"easier to understand products" IDI 008 question J4

"run the business like a business" IDI 009 question J9

"they should be able to do overnight ...in a regional area"

IDI 015 question J4

"focus on ease of use and give us quality products" IDI 012 question J4

My conclusion is drawn directly from these comments and other more general impressions that better performance is directly linked to listening better to constructive criticism from customers and to their needs.

#### Attachment Response USPS/APWU-RT2-1

#### DOCKET NO. N2021-1 CASE DOCUMENTS

#### **USPS** Direct Testimony:

- Direct Testimony of David Williams (USPS T-1), December 5, 2011
- Direct Testimony of Stephen Masse (USPS-T-2), December 5, 2011
- Direct Testimony of Emily Rosenberg (USPS-T-3), December 5, 2011
- Direct Testimony of Frank Neri (USPS-T-4), December 5, 2011, revised January 27, 2012, February 2, 2012 and March 5, 2012
- Direct Testimony of Cheryl Martin(USPS-T-6), December 5, 2011, revised January 23, 2012
- Direct Testimony of Rebecca Elmore-Yalch (USPS-T-11), December 5, 2011, revised March 9, 2012
- Direct Testimony of Gregory Whiteman (USPS-T-12), December 5, 2011, revised
   March 6, 2012

## **USPS Public Library References:**

- USPS-LR-N2012-1/2 (December 5, 2011)
- USPS-LR-N2012-1/7 (December 9, 2011)
- USPS-LR-N2012-1/8 (December 9, 2011)
- USPS-LR-N2012-1/26 (December 5, 2011, Addendum January 25, 2012)
- USPS-LR-N2012-1/61(February 3, 2012)
- USPS-LR-N2012-1/62 (February 7, 2012)
- USPS-LR-N2012-1/70 (March 9, 2012)
- USPS-LR-N2012-1/74 (February 19, 2012)
- USPS-LR-N2012-1/84 (April 19, 2012)
- USPS-LR-N2012-1/88 (April 19, 2012)

#### Attachment Response USPS/APWU-RT2-1

#### **USPS Non-Public Library References:**

- USPS-LR-N2012-1/NP1 (December 5, 2011, revised March 6, 2012, Supplement filed April 23, 2012)
- USPS-LR-N2012-1/NP2 (December 5, 2011)
- USPS-LR-N2012-1/NP4 (December 5, 2011)
- USPS-LR-N2012-1/NP6 (December 5, 2011)
- USPS-LR-N2012-1/NP7 (January 6, 2012)
- USPS-LR-N2012-1/NP8 (January 12, 2012)
- USPS-LR-N2012-1/NP10 (January 20, 2012)
- USPS-LR-N2012-1/NP11 (January 26, 2012)
- USPS-LR-N2012-1/NP12 (January 31, 2012)
- USPS-LR-N2012-1/NP14 (March 6, 2012)
- USPS-LR-N2012-1/NP15 (March 6, 2012)
- USPS-LR-N2012-1/NP16 (March 8, 2012)
- USPS-LR-N2012-1/NP17 (March 9, 2012)

#### **USPS Interrogatory Responses:**

Each interrogatory or information request cited below is inclusive of any response filed.

- Reviewed all APWU interrogatories and responses received relative to:
  - USPS-T-1
  - USPS-T-2
  - USPS-T-3
  - USPS-T-4
  - USPS-T-6
  - USPS-T-11
  - USPS-T-12
  - USPS Institutionally
- PR/USPS-T4-15, April 17, 2012
- PR/USPS-T1-7, April 17, 2012
- PR/USPS-T12-1-7, March 13, 2012
- APWU Motion to Compel Response to APWU/USPS-21-22, April 20, 2012
- DFC/USPS-T12-10-12, redirected to USPS March 16, 2012

# Attachment Response USPS/APWU-RT2-1

- POIR 1 Questions 19-21, January 9, 2012 and January 13, 2012
- POIR 2 Question 17-19, January 24, 2012
- POIR 5 Question 2, March 8, 2102

#### Attachment Response USPS/APWU-RT2-1

#### OTHER USPS AND U.S. GOVERNMENT DOCUMENTS

Any interrogatory or information request cited below is inclusive of any response filed. Web addresses for Postal Regulatory Commission (PRC) Library or Federal Register documents are provided in generic form here:

PRC Library - <a href="http://www.prc.gov/prc-pages/library/default.aspx?view=main">http://www.prc.gov/prc-pages/library/default.aspx?view=main</a>

Federal Register - <a href="https://www.federalregister.gov">https://www.federalregister.gov</a>

 Request for Comments Proposal to Revise Service Standards for First-Class Mail, Periodicals, and Standard Mail Postal Service
 39 CFR Part 121 <a href="http://about.usps.com/news/electronic-press-kits/our-future-network/advance-proposal.pdf">http://about.usps.com/news/electronic-press-kits/our-future-network/advance-proposal.pdf</a>

- PRC Docket No. N2010-1 Six-Day to Five-Day Street Delivery and Related Service Changes, 2010
  - Direct Testimony of Rebecca Elmore-Yalch (USPS-T-8), revised July 21, 2012
  - Direct Testimony of Gregory Whiteman (USPS-T-9), revised July 16, 2012
- PRC Docket No. MC2010-36 Transferring Commercial Standard Mail Parcels to the Competitive Product list - Supplement to the Postal Service's Request, November 1, 2010
  - Order No. 689, Conditionally Granting Request to Transfer Commercial Standard Mail Packages to the Competitive Product List (March 2, 2011)
- PRC Docket No. MC2011-22 Restructuring First-Class Mail Product Offerings Request of the United States Postal Service Under Section 3642, February 24, 2011
  - Order No. 681, Notice and Order Concerning Proposed Changes to the Market Dominant and Competitive Product Lists (February 25, 2011)
  - Public Representative Comments in Response to Order No. 681, (March 16, 2011)
  - Chairman's Information Request (March 18, 2011)
  - Order No. 710, Order Adding Lightweight Commercial Parcels to the Competitive Products List, (April 16, 2011)

#### Attachment Response USPS/APWU-RT2-1

- PRC Docket No. M2012-13- Transferring Parcel Post to the Competitive Products List
  - Request of the United States Postal Service to Transfer Parcel Post to the Competitive Products List (April 26, 2012)
- Federal Register:
  - 72 Federal Register 72216, Modern Service Standards for Market-Dominant Products (December 19, 2007)
  - 76 Federal Register 77271, Postal Regulatory Commission, Competitive Product Postal Price Changes (December 12, 2011)
  - 77 Federal Register 13198 Part 3020 Product Lists (March 6, 2012)
  - 77 Federal Register 24996 Postal Regulatory Commission, New Postal Product (April 26, 2012)
- A Letter From the Postmaster General/CEO and the Chairman of the Board of Governors

Discussion of Vision 2013

**USPS** 

October 2008

- Vision 2013 Five-Year Strategic Plan for 2009-2013
   USPS
   October 2008
   http://about.usps.com/transforming-business/vision2013/full-document.pdf
- Integrated Financial Plan FY2012
   USPS
   http://about.usps.com/who-we-are/financials/integrated-financial-plans/fy2012.pdf
- Integrated Financial Plan FY2011
   USPS
   http://about.usps.com/who-we-are/financials/integrated-financial-plans/fy2011.pdf
- Integrated Financial Plan FY2010
   USPS
   http://about.usps.com/who-we-are/financials/integrated-financial-plans/fy2010.pdf

#### Attachment Response USPS/APWU-RT2-1

 Integrated Financial Plan – FY2009 USPS

http://about.usps.com/who-we-are/financials/integrated-financial-plans/fy2009.pdf

 Report on Universal Postal Service and the Postal Monopoly Postal Regulatory Commission December, 2008

http://www.prc.gov/Docs/61/61628/USO%20Report.pdf

Envisioning America's Future Postal Service

**USPS** 

March 2, 2010

http://about.usps.com/transforming-business/future-postal-service.html

 Ensuring a Viable Postal Service for America: An Action Plan for the Future USPS

March, 2010

http://about.usps.com/future-postal-service/actionplanforthefuture-march2010.pdf

 Report on Universal Postal Service and the Postal Monopoly USPS

October, 2008

http://about.usps.com/universal-postal-service/usps-uso-report.pdf

Projecting U.S. Mail Volumes to 2020
 Mel Wolfgang

Boston Consulting Group

March 2, 2010

http://about.usps.com/future-postal-service/bcg-march-2nd-presentation.pdf

 Projecting U.S. Mail Volumes to 2020 Final Report- Detail Boston Consulting Group March 2, 2010

http://about.usps.com/future-postal-service/bcg-detailedpresentation.pdf

 Projecting U.S. Mail Volumes to 2020 Narrative Boston Consulting Group March 2, 2010

http://about.usps.com/future-postal-service/gcg-narrative.pdf

#### Attachment Response USPS/APWU-RT2-1

USPS Future Business Model
 McKinsey & Company
 March 2, 2010
 http://about.usps.com/future-postal-service/mckinsey-usps-future-bus-model2.pdf

 Envisioning America's Future Postal Service: Options for a Changing Environment
 McKinsey & Company
 March 2, 2010
 <a href="http://about.usps.com/future-postal-service/mckinsey-march-2nd-presentation2.pdf">http://about.usps.com/future-postal-service/mckinsey-march-2nd-presentation2.pdf</a>

 Is Diversification the Answer to Mail Woes? The Experience of International Posts – Final Report Accenture February, 2010 <a href="http://about.usps.com/future-postal-service/accenture-presentation.pdf">http://about.usps.com/future-postal-service/accenture-presentation.pdf</a>

- Foundation for the Future –2010 Comprehensive Statement on Postal Operations 2010 Performance Report and 2011 Performance Plan USPS <a href="http://about.usps.com/strategic-planning/cs10/CSPO\_\_12\_2010.pdf">http://about.usps.com/strategic-planning/cs10/CSPO\_\_12\_2010.pdf</a>
- Annual Compliance Determination Report Fiscal Year 2011
   March 28, 2012
   http://www.prc.gov/Docs/81/81771/FY%202011%20ACD.pdf
- Modern Service Standards
   RIBBS National Customer Support Center
   <a href="https://ribbs.usps.gov/index.cfm?page=modernservicestandards">https://ribbs.usps.gov/index.cfm?page=modernservicestandards</a>
- Audit Report Business Rules for Modern Service Standards (Report Number EN-AR-09-002)

March 12, 2009

Jeffrey C. Williamson

Manager, Network Development and Support

http://www.uspsoig.gov/foia files/EN-AR-09-002.pdf

#### Attachment Response USPS/APWU-RT2-1

QUARTERLY RETAIL E-COMMERCE SALES 4th QUARTER 2011
Timothy Winters (Survey Processing): (301) 763-2713 CB12-29
William Davie (Survey Methodology): (301) 763-7182
Deanna Weidenhamer (Seasonal Adjustment): (301) 763-7186
US Census Bureau News, US Dept of Commerce
Thursday, February 16, 2012

http://www.census.gov/retail/mrts/www/data/pdf/ec current.pdf

 RARC-WP-12-006 The USPS Global Card: A Conceptual Analysis of a Smart Card Platform

Office the Inspector General

February 13, 2012

http://www.uspsoig.gov/foia\_files/RARC-WP-12-006.pdf

 FT-MA-10-002 Management Advisory – Summary of Substantial Overfunding in Postal Service Pension and Retiree Health Care Funds September 30, 2010 <a href="http://www.uspsoig.gov/foia">http://www.uspsoig.gov/foia</a> files/FT-MA-10-002.pdf

 GA-12-470\_U.S. Postal Service – Mail Processing Network Exceeds What is Needed for Declining Mail Volume
 U.S. Government Accounting Office April 2012
 http://www.gao.gov/assets/600/590081.pdf

 ACR-2011 FY 2011 Annual Compliance Report USPS
 December 29, 2011 <a href="http://www.prc.gov/Docs/79/79166/FY.2011.ACR.pdf">http://www.prc.gov/Docs/79/79166/FY.2011.ACR.pdf</a>

Docket No. N2011-1 Reply Brief of the American Postal Workers Union, AFL-CIO (November 10, 2011)
 http://www.prc.gov/Docs/77/77672/APWU%20Reply%20Brief%20x.pdf

 Area Mail Processing Handbook USPS
 March, 2008
 http://about.usps.com/handbooks/po408.pdf

#### Attachment Response USPS/APWU-RT2-1

 Frequently Asked Questions – Service Standards USPS

http://about.usps.com/news/electronic-press-kits/our-future-network/service-standards-110915.pdf

 Modern Service Standards USPS

https://ribbs.usps.gov/index.cfm?page=modernservice

 39 CFR Part 121 Proposal to Revise Service Standards for First-Class Mail, Periodicals, and Standard Mail <a href="http://about.usps.com/news/electronic-press-kits/our-future-network/advance-proposal.pdf">http://about.usps.com/news/electronic-press-kits/our-future-network/advance-proposal.pdf</a>

Modern Service Standards for Market-Dominant Products
 Federal Register
 A Rule by the Postal Service on 12/19/2007
 <a href="https://www.federalregister.gov/articles/2007/12/19/E7-24365/modern-service-standards-for-market-dominant-products">https://www.federalregister.gov/articles/2007/12/19/E7-24365/modern-service-standards-for-market-dominant-products</a>

USPS

https://www.usps.com/ http://about.usps.com/ https://ribbs.usps.gov

#### Attachment Response USPS/APWU-RT2-2

#### **SHORTER CYCLES SECONDARY SOURCES**

#### • 39 USC § 102 - DEFINITIONS

Legal Information Institute
Cornell University Law School
<a href="http://www.law.cornell.edu/uscode/text/39/102">http://www.law.cornell.edu/uscode/text/39/102</a>

### Senate poised to tackle postal reform

By Bernie Becker The Hill March 22, 2012

http://thehill.com/blogs/on-the-money/budget/217751-postal-reform-bill-to-hit-senate-floor-next-week

# • The Postal Service Nears Collapse

By Devin Leonard
Bloomberg Businessweek
May 26, 2011
<a href="http://www.businessweek.com/print/magazine/content/11\_23/b4231060885070.htm">http://www.businessweek.com/print/magazine/content/11\_23/b4231060885070.htm</a>

#### • The Proposed USPS Network: A Second Best Solution

Bv Alan Robinson Courier, Express and Postal Observer September 16, 2011 http://courierexpressandpostal.blogspot.com/

#### • USPS Taking Market Share in Parcel Delivery

Bv Alan Robinson Courier, Express and Postal Observer AUGUST 20, 2011

http://courierexpressandpostal.blogspot.com/2011/08/usps-taking-market-share-in-parcel.html

#### Attachment Response USPS/APWU-RT2-2

#### June Deliverable Retail Sales Remain at 20.5% of Total

By Alan Robinson Courier, Express and Postal Observer August 21, 2011

http://courierexpressandpostal.blogspot.com/2011/08/june-deliverable-retail-sales-remain-at.html

#### A Look Back at the 2011 Holiday Shopping Season

By Glan Fulgoni comScore Voices January 12, 2012

http://blog.comscore.com/2012/01/2011\_holiday\_shopping\_season.html

### • USPS explains "flawed" estimate of losses from mail plant closures

Post & Parcel March 23, 2012

http://postandparcel.info/46619/news/companies/usps-explains-flawed-estimate-of-losses-from-mail-plant-closures/

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